



*United States Attorney  
Eastern District of New York*

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AB:MT:sw  
F.#2009R00195  
Disc. 2

271 Cadman Plaza East  
Brooklyn, New York 11201

April 14, 2010

**Via USPS and ECF**

All Defense Counsel

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Re: United States v. James Bombino, et al.  
Criminal Docket No. 10-147 (SLT)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following supplemental discovery with respect to the above-captioned case. The government hereby reiterates its request for reciprocal discovery.

**STATEMENTS OF DEFENDANTS**

The discs described below are available at DupeCoop. You may obtain these materials by contacting John Palermo at (973) 895-1359. We are producing these materials on the understanding that defense counsel will comply with the terms of the government's proposed protective order, which was referenced in the government's March 23, 2010 letter to the Court, until such time as Judge Townes has ruled on the government's request. A copy of the proposed protective order is attached hereto.

Discovery Exhibit 9 consists of 829 compact discs (Bates numbers 10885-11713), containing audio recordings of statements made by the defendants to a confidential witness. Attached is a chart identifying the dates each of the defendant(s) were recorded (Bates numbers 11714-11719).

Please contact me if you have any questions or additional requests.

Very truly yours,

BENTON J. CAMPBELL  
United States Attorney

By: /s/  
Samantha E. Ward  
Paralegal Specialist  
(718) 254-6142

cc: Clerk of Court (SLT) (by ECF, without exhibits)